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Assistant City Attorney

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
(CAMDEN VICINAGE)

In re:	:	Case No. 16-33510-ABA
	:	
Eva E. Acevedo	:	Chapter 13
	:	
Debtor (s)	:	OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

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TO: CLERK, U.S. BANKRUPTCY COURT  
ISABEL BALBOA, TRUSTEE  
EVA E. ACEVEDO, DEBTOR

The City of Camden "Camden" objects to debtor's Chapter 13 Plan for the following reasons:

1. Debtor's Plan fails to provide for the payment of the City's secured claim for unpaid water and sewer charges against 1266 Kenwood Ave. in the amount of \$590.63, which amount includes estimated interest over the life of a 60 month Plan at the statutory rate of 18%. A copy of the proof of claim is on file with Court as Claim #3.
2. Debtor's plan fails to meet the confirmation standard set forth in 11 U.S.C. §1325(a)(2)(B) because the City has not accepted the Plan and the Plan does not provide for the City to retain the lien securing such claims until the earlier

of (aa) the payment of the underlying debt determined under the non-bankruptcy law or (bb) discharge under section 1328.

3. Debtor's plan does not comply with 11 U.S.C. §1325(a)(2)(B) because the value of the property to be distributed under the plan is less than the allowed amount of the City's claims.
4. The City will withdraw its objection in the event the Debtor's Chapter 13 Plan is modified to provide for payment in full of the City's claims as follows:

Claim #	Address	Claim Amount	Date filed
3	1266 Kenwood Ave. (W/S)	\$590.63	1/6/2017

WHEREFORE, the City of Camden prays that the plan of reorganization not be confirmed and that this Chapter Thirteen petition be dismissed unless said plan of reorganization is modified to comply with the aforementioned deficiencies.

MARC A. RIONDINO  
City Attorney

Date: 1/14/2017

By: /s/ Michelle Banks-Spearman  
MICHELLE BANKS-SPEARMAN  
Assistant City Attorney